

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

United States of America
v.

Jacob Glenn

Defendant(s)

Case No.

1:22-mj-497

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 12/22/21 to 1/31/22 in the county of Delaware and others in the
Southern District of Indiana, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 2251(a) and (e)

Sexual Exploitation of a Child

18 U.S.C. § 1591(a)(1) and (b)(2)
and (c)

Sex Trafficking of a Minor

18 U.S.C. § 2252(a)(2)

Distribution / Receipt of Visual Depictions of Minors Engaged in Sexually
Explicit Conduct

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

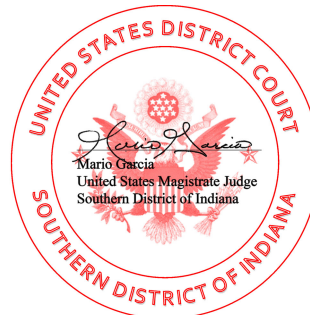
s/Darin Odier

Complainant's signature

Darin Odier, TFO FBI

*Printed name and title*Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by
telephone *(reliable electronic means)*

Date:

6/17/2022City and state: Indianapolis, Indiana

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Darin Odier, being duly sworn, hereby depose and state as follows:

1. **Affiant:** I am a Detective in the Internet Crimes Against Children Unit of the Indianapolis Metropolitan Police Department. I am also a cross-designated Task Force Officer assigned to the Federal Bureau of Investigation (FBI), within the Indianapolis Child Exploitation Task Force.

2. **Experience:** I have over 33 years of law enforcement experience. I have investigated State and Federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography. I have written hundreds of search warrants involving internet crimes against children cases and participated in their execution.

3. **Training:** I have attended and presented at the National Crimes Against Children Conference multiple times and attended numerous classes related to investigating the online sexual exploitation of children. I am also a member of the Indiana Internet Crimes Against Children Task Force, which includes numerous federal, state, and local law enforcement agencies. I am currently assigned to operate in an undercover capacity on the Internet to identify and investigate persons attempting to exploit or solicit sexual acts with children or trafficking in child pornography. As a Task Force Officer, I am authorized to investigate violations of the laws of the State of Indiana and of the United States and to execute warrants issued under the authority of the State of Indiana and of the United States.

4. **Information provided:** The statements in this affidavit are based on information obtained from my observations and communications, as well as information learned from other law enforcement officers and witnesses. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant and criminal complaint, I have not included each and every

fact known to the investigators concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that **Jacob Glenn (Glenn)** committed a criminal offense.

5. **Charged Conduct:** For the reasons listed below, there is probable cause to believe that **Jacob Glenn (Glenn)** DOB xx-xx-1997 (known to affiant, but redacted) has committed the following offenses in the Southern District of Indiana and elsewhere:

A. **Count 1: Sexual Exploitation of a Child:** On or between January 16, 2022 to January 18, 2022, within the Southern District of Indiana, **Jacob Glenn** sexually exploited Minor Victim 1, a child who was less than 18 years of age, by using each minor or attempting to the minor to create visual depictions of Minor Victim 1 engaging in sexually explicit conduct, using materials that travelled in interstate or foreign commerce, in violation of 18 U.S.C. § 2251(a) and (e);

B. **Count 2: Sex Trafficking of a Minor:** On or between December 22, 2021-January 18, 2022, within the Southern District of Indiana **Jacob Glenn** did knowingly recruit, entice, harbor, transport, provide, obtain, , maintain, patronize, or solicit, by any means, a person knowing, or in reckless disregard of the fact, that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, or having had a reasonable opportunity to observe the minor.

C. **Count 3: Distribution / Receipt of Visual Depictions of Minors Engaged in Sexually Explicit Conduct:** On or between December 24, 2021 and January 31, 2022, within the Southern District of Indiana **Jacob Glenn**, knowingly distributed a visual depiction, using any means or facility of interstate or foreign commerce, by any means including by computer, where the producing of such visual

depiction involves the use of a minor engaging in sexually explicit conduct; and such visual depiction is of such conduct, including at least one visual depiction of a child who the Defendant knew to be less than 18 years of age, in violation of 18 U.S.C. § 2252(a)(2).

STATUTORY AUTHORITY:

6. Sexual Exploitation of a Child and Attempt (18 U.S.C. § 2251(a) and (e)):

This statute provides that “Any person who employs, uses, persuades, induces, entices, or coerces any minor to engage in, or who has a minor assist any other person to engage in, or who transports any minor in or affecting interstate or foreign commerce, or in any Territory or Possession of the United States, with the intent that such minor engage in, any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct, shall be punished as provided under subsection (e), if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, if that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or if such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed.” It is also a crime to attempt to sexually exploit a child. 18 U.S.C. § 2251(e).

7. Sex Trafficking of a Minor: 18 U.S.C. § 1591(a)(1) and (b)(2) and (c), in pertinent parts, makes it a crime to, in or affecting interstate commerce, knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, or solicit, by any means,

a person knowing, or, except where the act constituting the violation is advertising, in reckless disregard of the fact, that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act. Where the defendant had a reasonable opportunity to observe the person so recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, or solicited, and knew or recklessly disregarded the fact that the person would be caused to engage in a commercial sex act, the Government need not prove that the defendant knew, or recklessly disregarded the fact, that the person had not attained the age of 18 years. *See* Seventh Circuit Criminal Pattern Jury Instructions (2000) at 650-52.

8. **Distribution and Receipt of a Visual Depiction of a Minor Engaged in Sexually Explicit Conduct (18 U.S.C. § 2252(a)(2)):** This investigation concerns alleged violations of 18 U.S.C. § 2252(a)(2), which prohibits a person from knowingly receiving and distributing any visual depiction using any means or facility of interstate or foreign commerce or that has been mailed, or has been shipped or transported in or affecting interstate or foreign commerce, or which contains materials which have been mailed or so shipped or transported, by any means including by computer, or knowingly reproducing any visual depiction for distribution using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or through the mails, if the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct; and such visual depiction is of such conduct.

9. **Definitions:** The following definitions apply to this Affidavit:

A. The term “minor,” as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.

B. The term “sexually explicit conduct,” as defined in 18 U.S.C. § 2256(2)(A)(i-v), means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic areas of any person.

C. The term “visual depiction,” as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image, and data which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

D. The term “commercial sex act,” as defined in 18 U.S.C. § 1591(e)(3), means any sex act, on account of which anything of value is given to or received by any person.

PRESENT INVESTIGATION AND PROBABLE CAUSE

10. The investigation into Defendant Jacob Glenn spans at least three counties and involves allegations that Jacob Glenn used Snapchat and other internet-based chat platforms to communicate with minor females, portraying himself as a minor male. Glenn did this for purpose of obtaining sexually explicit images of the minor females and / or for the purpose of meeting the minor females to engage in sexually explicit conduct with the minor females. Because of their ages, sexual conduct between these minors and Glenn was illegal.

11. **Delaware County - Minor Victim 1:** This affiant learned the following information from Officer Cody Painter, a police officer employed by the Chesterfield, Indiana Police Department.

A. **Information from Minor Victim 1's Father:** On April 11, 2022, Officer Painter met with a person referred to herein as Witness 1 (identity known to Your Affiant) at the Chesterfield Police Department. Witness 1 wanted to report sexual misconduct allegations involving his daughter, Minor Victim 1 (identity known to Your Affiant). Minor Victim 1 was, at all times relevant to this investigation, less than 15 years of age.

i. Witness 1 stated that while having a conversation with his children, he asked them if there was anything any of them needed to tell them. Witness 1's son told Witness 1 that Minor Victim 1 has "vapes" in her room.

ii. When confronted by Witness 1, Minor Victim 1 told Witness 1 that she got the vapes from having sex with someone. Witness 1 inquired further into the incident and Minor Victim 1 explained that she met a guy online named "Andy Glenn" and that he said he was 16 years old. Minor Victim 1 and "Andy" began communicating via unknown means, however, Witness 1 believed it was possibly on Snapchat.

iii. Minor Victim 1 told Witness 1 that on the night of December 24th, leading into the morning of December 25th, 2021, she snuck out of her bedroom window and met "Andy" down the road from her house. From there, "Andy", took Minor Victim 1 to the back-parking lot of the Pilot Travel Center located at 15876 West Commerce Road in Daleville, IN in the Southern District of Indiana. Minor Victim 1 told Witness 1 that she was going to buy the vapes from "Andy;" however, "Andy" told her he was not going to take money for the vapes, and they

could work out a deal. The “deal” consisted of trading sex in exchange for the vapes.

iv. Witness 1 told Officer Painter that Minor Victim 1 would not tell him the details of what type of intercourse occurred.

v. Minor Victim 1 told Witness 1 that she snuck out of the house and met with “Andy” on another occasion, which was on January 17th, 2022, at around 12:30 a.m. Witness 1 was unsure of what type of sexual intercourse occurred on this date.

vi. Witness 1 provided Officer Painter with Minor Victim 1's cell phone and unlock code so that the phone could be forensically examined.

vii. Witness 1 provided Officer Painter with the suspect’s Snapchat username, “theplugfogshyde”.¹ Witness 1 informed Officer Painter that at some point in Minor Victim 1 and Andy's communication, he told her he was actually 24 years old.

B. Officer Painter researched the suspect “Andy Glenn”. Officer Painter identified a person of interest that matched the suspect’s description, named Jacob Scott Glenn (DOB **/**/1997). Upon further research, Officer Painter found that Glenn was arrested in Madison County on October 19, 2020 for Sexual Misconduct with a Minor under cause number 48C03-2010-F4-002406 and was, in April of 2022, out on custody, on bond, for that charge.

i. Officer Painter contacted Detective J. Sundheimer with the Madison County Sheriff’s Department, who was the lead investigator on that

¹ This Affiant knows this username contains slang. “Plug” is slang for connection or dealer. “Fog” is slang for Vape Pens or E-cigarettes. Hyde is a specific brand of Vape Pens or E-cigarettes.

case. They discussed the cases and the similarities between them. Jacob Glenn provided a fake name and age to the Madison County victim, only to reveal his true age later into his communications with the victim (referred to herein as Minor Victim 2, identity known to Your Affiant).

ii. Detective Sundheimer also provided Officer Painter with information that Montgomery County was currently investigating Jacob Glenn for an additional case of Sexual Misconduct with a Minor or Child Molesting. Officer Painter spoke with detectives with the Montgomery County Sheriff's Department and learned of similarities in the cases including that Glenn had provided a fake name and age, and Glenn exchanged e-cigarettes and/or vapes for sex with a minor, referenced herein as **Minor Victim 3** (identity known to Your Affiant).

C. **Examination of Minor Victim 1's Cell Phone:** A preliminary search of Minor Victim 1's phone was conducted by Officer Painter.

i. Within Minor Victim 1's Snapchat profile, photos and videos showed that Minor Victim 1 was at a Pilot Travel Center. There was at least 1 video in which Minor Victim 1 described the events that occurred with "Andy."

ii. A photo taken on December 25th, 2021 at 12:26 a.m. was located. The photo, which appears to have been taken inside of "Andy's" vehicle, displayed a Pilot Travel Center sign and the vehicle's GPS screen showing it was at the Pilot Travel Center.

iii. A photo taken on December 25th, 2021 at 1:50 a.m., shows Minor Victim 1 holding three e-cigarettes. In this photo, Minor Victim 1 appears to be back at her residence.

iv. A photo taken on December 25th, 2021 at 2:00 a.m., shows three e-cigarettes laying on a blanket with a message, “what one do i open first”.

v. Videos spanning on December 25th, 2021 from 1:52 a.m. – 2:06 a.m. depict Minor Victim 1 describing the sexual intercourse that occurred between her and “Andy.”

vi. A photo taken on January 17th, 2022 at 1:14 a.m., which appears to have been taken from inside of “Andy’s” vehicle, was located. The photo depicted a vehicle’s GPS screen, showing that the vehicle was traveling eastbound near the International Union of Operating Engineers Local 103 located at 4277 E. County Road 67 in Chesterfield, IN. The GPS, in the top right-hand corner displays “Pilot Travel Center”.

vii. A photo taken on January 17th, 2022 at 1:48 p.m., displays Minor Victim 1 with her shirt lifted up and bruising on her breast.

viii. An additional video was located that was taken on January 17th, 2022 at 9:47 p.m. In the video, Minor Victim 1 said that she had sex with “that guy again last night” and that she had told “Andy” he could take videos. She said she had the videos. In the recording, Minor Victim 1 lifted up her shirt to reveal some bruising on her breast.

ix. Within Minor Victim 1’s deleted photos folder on her phone, Officer Painter located two additional photos and one video, I believe to be associated with this case:

a. A photo showing the face of the suspect, “Andy”, without a date/time stamp. I could identify the male in the photo by utilizing a jail

book-in photograph as Jacob Glenn (DOB **/**/1997). The photograph had a message across it, "My dick was sooooo good. Ur pussy was fuckin amazing tho. I'm glad I can be ur 1st".

b. A photo believed to depict the wrist of the suspect (based on the context of the message on it and the other image / video), with no date/time stamp on it. Worn on the wrist in the photo is a pink/tan hair band with the message, "I'm taking this. I give u a Christmas gift to remember me. I want this to remember u".

c. A video depicting a penis penetrating a vagina was also located in the "deleted photos" folder on Minor Victim 1's cell phone. There was no date or time associated with the video.

x. A full forensic examination of Minor Victim 1's cell phone is ongoing.

D. **Interview of Minor Victim 1:** On April 18, 2022, Officer Painter attended a forensic interview of Minor Victim 1 at Kids Talk Advocacy Center in Anderson, IN. During the interview, Minor Victim 1 made the following disclosures:

i. Minor Victim 1 met the suspect, later identified as Jacob Glenn, in mid-December on a social media platform called Snapchat. Minor Victim 1 stated that Glenn identified himself as a 16-year-old but did not give his name, Minor Victim 1 identified herself as a 14-year-old. Minor Victim 1 did not recall whether she added Jacob or if Jacob added her first. Minor Victim 1 did state that the purpose of her conversations with Jacob was so that she could buy "vapes" otherwise known as e-cigarettes, from him.

ii. At one point during a conversation with Jacob, Minor Victim 1 said Jacob told her he did not accept money for the vapes and that she would have to do sexual stuff to receive them.

iii. Minor Victim 1 provided Jacob's Snapchat username as "theplugfogshyde".

iv. The conversations continued on Snapchat and eventually Glenn inquired about hanging out with her. Minor Victim 1 said that she gave Glenn multiple excuses as to why she couldn't hangout until December 24, 2021, when she agreed to meet him. Minor Victim 1 stated that Glenn finally gave her his name 20 minutes prior to meeting with him and that he said his name was "Andy".

v. Minor Victim 1 sneaked out of her house at around 12:00 or 12:30 a.m. on December 25, 2021, and Glenn picked her up at the end of the driveway. Glenn was driving a newer big, black truck. Minor Victim 1 stated that the truck had loud tires, LED underbody lights, no footsteps, possibly leather seats, and that there was a car seat in the backseat.

vi. Minor Victim 1 described Glenn as skinny, tall (6'), with short, dirty blonde hair and a little bit of a beard, and having a scar on his arm which Glenn described as from a fight with his dad where Glenn cut himself in the arm with a knife.

vii. After leaving Minor Victim 1's house, Minor Victim 1 and Glenn traveled to the Pilot Travel Center where Glenn backed into a parking spot. At one point in their conversation, Minor Victim 1 mentioned that Glenn looked

nervous, so she asked him why he was nervous. Glenn responded with “because you are new.” Minor Victim 1 thought since was odd, because Glenn had mentioned to her that this was not his first time doing this with a girl. Minor Victim 1 later clarified that Glenn told her that he has had sex in exchange for vapes.

viii. Minor Victim 1 stated once they were parked, Glenn removed the car seat from the backseat to the front seat of the truck and that a blue blanket was laying across the backseat. Minor Victim 1 stated that she and Glenn got undressed and went into the backseat of the truck. Minor Victim 1 stated that Glenn began touching her butt and that she laid down. Minor Victim 1 stated that at one point, Glenn asked her again if she was 14-years old, and she confirmed she was. Glenn then began to “rub” his penis on Minor Victim 1’s vaginal area, and then he inserted his penis inside of her. He had unprotected vaginal sex with her. Glenn made comments such as “you’re so beautiful” and “who owns this” referring to your vagina. The sexual conduct ended when Jacob ejaculated on Minor Victim 1’s stomach. Glenn then wiped his semen off of her with the blanket that they were laying on.

ix. After the sexual conduct, Glenn gave Minor Victim 1 three vapes. He then gave her permission to inspect the vapes to ensure they were not tampered with. Minor Victim 1 stated that Glenn then drove her home and that he held her hand on the way there. Before arriving at her house, Minor Victim 1 stated that Glenn asked her “are you sure this was your first time?” and also told her not to tell anyone that they had sex.

x. Minor Victim 1 arrived home around 1:30 a.m. – 2:00 a.m. Minor Victim 1 stated that approximately 10 minutes after Glenn dropped her off, he sent her photograph of his face that had a message stating how good she was.

xi. Minor Victim 1 stated that Glenn again contacted her on Snapchat and said, “hey it’s been like 3 weeks, why haven’t we hungout”. Minor Victim 1 stated that they arranged for her to sneak out again. Glenn again picked her up in the same vehicle and drove her to the Pilot. Minor Victim 1 states that once they were parked at the Pilot that they had sex, and Glenn took two videos of the intercourse. Minor Victim 1 stated that Jacob recorded the sexual intercourse on his iPhone. This time, during the intercourse Glenn gave Minor Victim 1 two hickies on her chest/breast area.²

12. **Montgomery County – Minor Victim 2:** This affiant spoke to Det. Jared Kirby (Kirby) of the Montgomery County Sheriff’s Department. Det. Kirby confirmed he is investigating a sexual misconduct case involving a minor female, identified herein as Minor Victim 2, (true identity known to law enforcement) and a male whose name begins with “J.”

A. This Affiant noted similarities in the investigations, including the suspect’s vehicle description, both involving a Pilot truck stop, intercourse in the back of the truck, and the same Snapchat username of “theplugfogshyde”.

B. Minor Victim 2 reported the male repeatedly asked her to send naked images of herself to him. Minor Victim 2 stated she did not send the images.

² This was consistent with the photographs Officer Painter located on Minor Victim 1’s phone.

C. The male communicating with Minor Victim 2 was later identified as Jacob Glenn. Minor Victim 2 was presented a photo array and circled the image of Jacob Glenn as the person with whom she interacted, both online and in person.

D. Minor Victim 2 stated that Glenn told her he has done this approximately 99 times before.

E. On February 15, 2022, Det. Kirby applied for and received a search warrant for the Snapchat account “theplugfogshyde” for the period of January 1, 2022 through January 31, 2022. The search warrant was issued by Montgomery County Superior Court 2 Judge Daniel G Petrie.

F. I reviewed the search warrant return from Snapchat. The return includes conversations between the user of “theplugfogshyde” and multiple people who identify themselves as minor females, usually between 13-15 years old. In almost every conversation, the user of theplugfogshyde offers “nic” and/or “alc” to “hang out” and reports he is “mobile in Indiana”.

i. In one conversation, the user of “theplugfogshyde” offers “nic to fuck”.

ii. In another chat, a Snapchat user who identified herself as a minor gave the user of “theplugfogshyde” her home address.

iii. The user of “theplugfogshyde” had a private message exchange with another Snapchat user, identified herein as Snapchat User A. This Affiant believes Snapchat User A is a minor female. During this chat, the user of “theplugfogshyde” sent a video of a male and female engaged in sexually explicit conduct to Snapchat User A.

13. **Distribution of Minor Victim 1 Video:** On May 9, 2022, Your Affiant observed a follow-up child forensic interview of Minor Victim 1. Minor Victim 1 was shown screenshots that were prepared from the video that “theplugfogshyde” distributed to Snapchat User A. Minor Victim 1 identified herself and the man who was identified as Jacob Glenn in the images. Minor Victim 1 also said that the screen shots are from the video Glenn recorded with his cell phone, depicting them engaged in sexual intercourse. Minor Victim 1 said that Glenn sent her this video through Snapchat.

14. **Madison County - Minor Victim 3:** This Affiant also confirmed that Jacob Glenn has a pending case for Sexual Misconduct with a Minor in Madison County, Indiana with some similarities. In that case, Glenn met his victim, identified herein as Minor Victim 3, on Snapchat. He initially told Minor Victim 3 he was 17 years old, and he admitted to police that he engaged in sexual intercourse on multiple occasions with Minor Victim 3, including after he knew she was 14 years old. At the time of his Madison County conduct, Glenn was at least 21 years of age, as the conduct occurred in 2020. Glenn was arrested for that conduct on or about October 19, 2020 and was released from custody, after posting a \$10,000 bond on October 20, 2020.

15. At the time of the conduct with Minor Victim 1 and Minor Victim 2, Glenn was on bond in Madison County for two Level 4 felonies: Sexual Misconduct with a Minor (Minor Victim 3).

A. Glenn did use Minor Victim 1 to engage in sexually explicit conduct for the purpose of creating a visual depiction of that conduct. He used a cell phone to make that recording, which cell phone would be manufactured outside of the State of Indiana or

contains parts manufactured outside of the State of Indiana, and therefore, travelled in interstate and foreign commerce.

B. Glenn did patronize and transport Minor Victim 1, in or affecting interstate commerce, knowing or in reckless disregard of the fact that Minor Victim 1 had not attained the age of 18 years and knowing she would be caused to engage in a commercial sex act, that is the trading of sexual conduct for anything of value, specifically e-cigarettes.

C. Glenn did distribute a video recording, depicting sexually explicit conduct with Minor Victim 1, to Snapchat User A and to Minor Victim 1 using Snapchat.

16. All of the described events occurred in the Southern District of Indiana.

17. Snapchat operates using the Internet, which is a means and facility of interstate and foreign commerce.

18. **Conclusion:** Based upon the contents of this Affidavit, there is probable cause to believe that **Jacob Glenn** has committed the above listed offenses. I respectfully request that the

Court issue a Criminal Complaint and Arrest Warrant for **Jacob Glenn** charging him with the offenses listed above.

s/Darin Odier

Task Force Officer Darin Odier
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by
telephone.

6/17/2022

